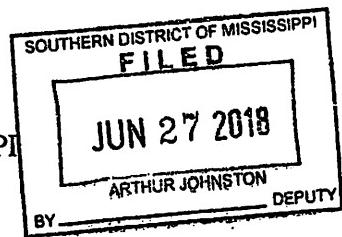


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:18-cr-00126-CWR-LRA

KYUNG BURGOS

18 U.S.C. § 1952(a)(3)

**The Grand Jury charges:**

Beginning in or about September 2013, and continuing through in or about August 2016, in Madison County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **KYUNG BURGOS**, aided and abetted by others known and unknown to the Grand Jury, used and caused to be used the mail and a facility in interstate and foreign commerce, to wit: the Internet, telephone, cellular phone, leased property, and motor vehicle(s), with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, a business enterprise involving prostitution in violation of Mississippi Code Annotated, 1972, Section 97-29-49, and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

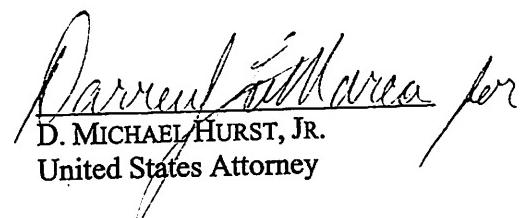
In violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offense as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offense.

Further, if any property described above, as a result of any act or omission of the defendant:  
(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited  
with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially  
diminished in value; or (e) has been commingled with other property, which cannot be divided without  
difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property  
of the defendant, up to the value of the property described in this notice or any bill of particulars  
supporting it.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924 and Title 28,  
United States Code, Section 2461.

  
D. MICHAEL HURST, JR.  
United States Attorney

A TRUE BILL:  
S/SIGNATURE REDACTED \_\_\_\_\_  
Foreperson of the Grand Jury

This Indictment was returned in open court by the foreperson or deputy foreperson of the Grand  
Jury on this the 27<sup>th</sup> day of June, 2018.

  
Linda L. Anderson  
UNITED STATES MAGISTRATE JUDGE